

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF UBER'S
STATEMENT IN RESPONSE TO
PLAINTIFF'S ADMINISTRATIVE MOTION
TO CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED [PLAINTIFF'S OPPOSITION TO
UBER'S MOTIONS IN LIMINE]**

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. Case No. 3:23-cv-06708-CRB
D. Ariz. Case No. 2:25-cv-04276-CRB

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA
PHOENIX DIVISION

JAYLYNN DEAN,

Plaintiff,

v.

UBER TECHNOLOGIES, INC., et al.,

Defendants.

CASE NO. 25-cv-4276-PHX-CRB

Judge: Hon. Charles R. Breyer

Courtroom: 501

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at Kirkland & Ellis LLP, counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I offer this Declaration in
4 the above-captioned matter in support of Uber’s Statement in Response to Plaintiff’s Administrative
5 Motion to Consider Whether Another Party’s Material Should Be Sealed [Plaintiff’s Opposition to Uber’s
6 Motions in Limine].

7 2. Plaintiff takes no position as to Uber’s proposed redactions.

8 3. Attached as Exhibit A is a true and correct copy of Plaintiff’s Opposition to Uber’s Motions
9 in Limine with Uber’s proposed redactions.

10 4. Attached as Exhibit B is a true and correct copy of Exhibit 2 to Plaintiff’s Opposition to
11 Uber’s Motions in Limine with Uber’s proposed redactions.

12 5. Attached as Exhibit C is a true and correct copy of Exhibit 3 to Plaintiff’s Opposition to
13 Uber’s Motions in Limine with Uber’s proposed redactions.

14 6. Attached as Exhibit D is a true and correct copy of Exhibit 4 to Plaintiff’s Opposition to
15 Uber’s Motions in Limine with Uber’s proposed redactions.

16 7. Attached as Exhibit E is a true and correct copy of Exhibit 5 to Plaintiff’s Opposition to
17 Uber’s Motions in Limine with Uber’s proposed redactions.

18 8. Attached as Exhibit F is a true and correct copy of Exhibit 6 to Plaintiff’s Opposition to
19 Uber’s Motions in Limine with Uber’s proposed redactions.

20 9. Attached as Exhibit G is a true and correct copy of Exhibit 7 to Plaintiff’s Opposition to
21 Uber’s Motions in Limine with Uber’s proposed redactions.

22 10. Attached as Exhibit H is a true and correct copy of Exhibit 15 to Plaintiff’s Opposition to
23 Uber’s Motions in Limine with Uber’s proposed redactions.

24 11. Attached as Exhibit I (Parts 1 and 2) is a true and correct copy of Exhibit 17 to Plaintiff’s
25 Opposition to Uber’s Motions in Limine with Uber’s proposed redactions.

26 12. Attached as Exhibit J is a true and correct copy of Exhibit 19 to Plaintiff’s Opposition to
27 Uber’s Motions in Limine with Uber’s proposed redactions.
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1 13. Attached as Exhibit K is a true and correct copy of Exhibit 20 to Plaintiff's Opposition to
2 Uber's Motions in Limine with Uber's proposed redactions.

3 14. Attached as Exhibit L is a true and correct copy of Exhibit 21 to Plaintiff's Opposition to
4 Uber's Motions in Limine with Uber's proposed redactions.

5 15. Attached as Exhibit M is a true and correct copy of Exhibit 22 to Plaintiff's Opposition to
6 Uber's Motions in Limine with Uber's proposed redactions.

7 16. Attached as Exhibit N is a true and correct copy of Exhibit 23 to Plaintiff's Opposition to
8 Uber's Motions in Limine with Uber's proposed redactions.

9 17. Attached as Exhibit O is a true and correct copy of Exhibit 35 to Plaintiff's Opposition to
10 Uber's Motions in Limine with Uber's proposed redactions.

11 18. Attached as Exhibit P (Parts 1 and 2) is a true and correct copy of Exhibit 47 to Plaintiff's
12 Opposition to Uber's Motions in Limine with Uber's proposed redactions.

13 19. Attached as Exhibit Q is a true and correct copy of Exhibit 48 to Plaintiff's Opposition to
14 Uber's Motions in Limine with Uber's proposed redactions.

15 20. Attached as Exhibit R is a true and correct copy of Exhibit 49 to Plaintiff's Opposition to
16 Uber's Motions in Limine with Uber's proposed redactions.

17 21. Attached as Exhibit S is a true and correct copy of Exhibit 50 to Plaintiff's Opposition to
18 Uber's Motions in Limine with Uber's proposed redactions.

19 22. Attached as Exhibit T is a true and correct copy of Exhibit 53 to Plaintiff's Opposition to
20 Uber's Motions in Limine with Uber's proposed redactions.

21 23. Attached as Exhibit U is a true and correct copy of Exhibit 54 to Plaintiff's Opposition to
22 Uber's Motions in Limine with Uber's proposed redactions.

1 I declare under penalty of perjury under the laws of the United States of America that the foregoing
2 is true and correct.

3 Dated: January 13, 2026

4 /s/ Laura Vartain Horn
5 Laura Vartain Horn
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